

# **EXHIBIT A**

Page 1

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2

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

4

5

DONNA WOOD, et al., )  
individually and on )  
behalf of all others )  
similarly situated, )  
                        )  
                        )  
Plaintiffs,         )  
                        )  
vs.                   ) No. 20 Civ. 2489  
                        ) (LTS) (GWG)  
MICHAEL BLOOMBERG 2020, )  
INC.,                 )  
                        )  
Defendant.         )  
----- )

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November 1, 2022

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8:58 a.m. CDT

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Videoconferenced deposition of ALAN C.  
ROBINSON, held virtually with the witness  
located in Sun Prairie, Wisconsin, before  
Laurie A. Collins, a Registered Professional  
Reporter and Notary Public of the State of New  
York.

Page 2

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2 A P P E A R A N C E S

3 (All attendees appearing via videoconference):

4

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6 Attorneys for Plaintiff

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8 Washington, D.C. 20001

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Page 3

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2 A P P E A R A N C E S (continued) :

3

4 PROSKAUER ROSE LLP

5 Attorneys for Defendant

6 11 Times Square

7 New York, New York 10036-8299

8 BY: NOA M. BADDISH, ESQ.

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10 ELISE M. BLOOM, ESQ.

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12 ALLISON L. MARTIN, ESQ.

13 amartin@proskauer.com

14

15 ALSO PRESENT:

16 ELLE ESHLEMAN, Law Clerk (Outten)

17 HOWARD BRODSKY, Videographer

18 DUANE MILNER, Concierge Technician

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Page 4

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2                   THE VIDEOGRAPHER: Good morning. Here  
3 begins the video recorded virtual remote  
4 deposition of Alan Robinson appearing from his  
5 location in Sun Prairie, Wisconsin. This         08:58:09  
6 deposition is taken by the defendants in the  
7 matter of Donna Wood, et al., plaintiffs,  
8 versus Mike Bloomberg 2020, defendant, Case  
9 Number 1:20-cv-2489 (LTS) (GWG), in the United  
10 States District Court, Southern District of      08:58:32  
11 New York.

12

13                   Today is Tuesday, November 1, 2022.  
14                   The time is approximately 8:58 a.m. central  
15                   daylight time.

16

17                   My name is Howard Brodsky, and I am the    08:58:49  
18                   video legal specialist in association with  
19                   Veritext Legal Solutions, with offices in New  
20                   York, New York. The court reporter is Laurie  
21                   Collins, in association with Veritext.

22

23                   Counsel have stipulated that all        08:59:04  
24                   appearances shall be recorded by the  
25                   stenographic court reporter into the court  
                 record and have further stipulated and agreed  
                 that the court reporter may take the  
                 deponent's oath remotely.                           08:59:19

1 Robinson

2 and harass minorities in this country, because the  
3 most dangerous thing about cannabis is that it is  
4 illegal.

5 Q. And how does that relate to your 09:31:43  
6 cofounding a business that sells cannabis?

7           A.       Because as an advocate I became an  
8           expert in cannabis.

9 Q. What do you mean, "an expert in  
10 cannabis"? 09:31:58

11 A. In the capital of Wisconsin, I am  
12 considered a subject matter expert on cannabis.

13 Q. What kinds of things do you know about  
14 cannabis?

15 A. Quite a few. 09:32:14

Q. Can you tell me about them?

17           A.     Sure.   The cannabis plant, for  
18           instance, creates a cannabinoid called  
19           cannabigerolic acid initially.   It uses  
20           cannabigerolic acid to create three major  
21           cannabinoids.   Those would be THCA, CBDA,  
22           CBGA

23 It uses those 3 cannabinoids to create  
24 the other 13 molecular groups of cannabinoids, of  
25 which there are over 115. We know about -- 09:33:03

1 Robinson

2 So I'm not trying to be elusive; I'm  
3 just trying to make sure that you understand that  
4 there is the possibility that I've spoken to some  
5 of my class representatives -- some of the folks 11:32:10  
6 that I represent. I just don't remember what  
7 those conversations would have been right now.

8 Q. Who are the people that you represent?

9           A.       Field organizers in Wisconsin.

10 Q. And who have you -- 11:32:32

11 A. Who worked for Bloomberg.

12 Q. Who have you been in contact with

13 that -- who is a field organizer who worked for  
14 the Bloomberg campaign in Wisconsin?

15 MS. COLE-CHU: Objection to form. 11:32:42

16 A. Tristan Angulo and two others, but I  
17 don't recall their names right now.

18 Q. And how have you communicated with  
19 these people?

20 A. Via various messaging services like 11:33:06  
21 WhatsApp and Signal.

22 Q. So do you have access to those  
23 messages?

24 A. Do I? I don't -- no, no, actually, no,  
25 because all of my messages are set to immediately 11:33:26

Page 93

1 Robinson

2 delete.

3 Q. Were you instructed by your attorneys  
4 to preserve documents relating to this case?

5 A. Relating to the case?

11:33:41

6 MS. COLE-CHU: Objection.

7 MS. BADDISH: What's the objection,  
8 Hannah?

9 MS. COLE-CHU: You're asking him what  
10 legal advice that he received from his  
11 attorneys and --

11:33:52

12 MS. BADDISH: That's not what I asked.  
13 I asked him if he -- if he was instructed to  
14 preserve documents relating to this case. I  
15 didn't ask for the substance of those  
16 communications.

11:34:04

17 Q. And you should not disclose any  
18 communications, Mr. Robinson, that you had with  
19 your attorneys. I'm just asking you whether or  
20 not you have been instructed to preserve  
21 documents.

11:34:12

22 A. That sounds to me like disclosing a  
23 communication that I would have with my attorney,  
24 and so I'm not going to answer on the grounds that  
25 my attorney has told me not to answer that kind of

11:34:22

Page 94

1 Robinson

2 thing.

3 MS. BADDISH: Hannah, are you  
4 instructing him not to answer that question?

5 THE WITNESS: Should I answer that 11:34:28  
6 question?

7 MS. COLE-CHU: You can -- you can give  
8 testimony -- you can -- you can respond to the  
9 question whether you were instructed to  
10 preserve documents, if you understand. 11:34:36

11 A. Yes. Ah, yes, yes, I was explicitly --  
12 yep.

13 Q. And when were you instructed to  
14 preserve documents?

15 A. I don't recall, because it would have 11:34:57  
16 been --

17 Q. What documents were those?

18 A. Any documents that I had access to,  
19 meaning any documents that I had.

20 Q. Oh, sorry. 11:35:12

21 A. Any documents that I had.

22 Q. Did you understand documents to include  
23 messages?

24 A. I did not, not at that time, no.

25 Q. What do you mean, "not at that time"? 11:35:28

1 Robinson

2           A.     By your line of question, it appears as  
3        if documents includes personal messages sent  
4        between organizers after the lawsuit had been  
5        filed. I was not aware that I needed to preserve    11:35:43  
6        those documents. Fortunately I have backups of  
7        everything.

8 Q. Okay. That's great. We'll be calling  
9 for the production of that information.

10 What documents did you search for 11:36:03  
11 related to this case?

12           A.       Any e-mails and messages that I had  
13       between Josh Dellaquila, other organizers, I'm  
14       sure.

15 Q. Anything else? 11:36:21

16 A. I'm uncertain. Whatever documents that  
17 I had in my possession I produced.

18 Q. Okay. And you testified earlier that  
19 you understand that you're a class representative;  
20 right? What do you understand your role as a 11:36:41  
21 class representative to entail?

22 A. To participate fully in this process,  
23 to make myself available to the class that I  
24 represent, to inform them in regards to this  
25 lawsuit, and, you know, to -- again, to 11:37:02

1 Robinson

2 Q. Have you ever been arrested?

3 A. Yes, ma'am.

4 Q. When were you arrested?

5 A. Several times, multiple times. I don't 11:51:03  
6 remember exact dates. If you would like me to  
7 produce my criminal history, though.

8 Q. Yes. I think we'll be calling for  
9 that.

10 Can you explain to me the circumstances 11:51:22  
11 surrounding any of those arrests?

12 A. Yeah. I have several OWIs, potentially  
13 five. I've got a felony OWI for sure, operating  
14 while intoxicated. It's driving while under the  
15 influence of alcohol. 11:51:41

Q. Do you know when that occurred?

17           A.     Approximately seven to ten years ago  
18       and further back.

19 Q. When was the last time that you were  
20 arrested?

21           A.     Perhaps seven years ago, maybe more. I  
22     don't really know. Maybe five years ago. I don't  
23     know. I don't know.

Q. Did you ever serve any time in jail?

25 A Yes

Page 103

1 Robinson

2 come and get you from the --

3 Q. How many times have you been in jail?

4 A. It's been a while now since I've been  
5 in jail. They usually don't lock you up after you 11:54:29  
6 gain any affluence and influence. But I was Black  
7 in Wisconsin for a long time, so a bunch.

8 Q. Do you know about how many?

9 A. Huh-uh, eight, nine, eight, nine. Who  
10 knows. 11:54:52

11 Q. And how many times were you arrested?

12 A. I don't know.

13 Q. And were you ever convicted of a crime?

14 A. I have been convicted, yes.

15 Q. How many times? 11:55:09

16 A. At least five, as I --

17 Q. And what were the times?

18 A. OWI and/or -- there was the one fleeing  
19 and eluding; right? But OWIs, DUIs.

20 Q. Okay. 11:55:29

21 A. Drinking and driving in Wisconsin. The  
22 drinking is state and the country.

23 Q. Okay.

24 Going back to Robinson Exhibit 8, is  
25 this the other document that you reviewed in 11:55:58

Page 114

1 Robinson

2 besides the Bloomberg campaign?

**3**                   **A.**                   **No.**

4 Q. Let's move on to Robinson Exhibit 10.

5                  A.                  10?

12:09:16

6 MS. COLE-CHU: Noa, can we take a break  
7 after this exhibit?

8 MS. BADDISH: We'll see. I might  
9 almost be done so...

10 MS. COLE-CHU: Okay.

12:09:29

11 A. I'm looking at Exhibit 10.

12 Q. Okay. Would you agree that -- have you  
13 seen Exhibit 10 before?

14 A. Yes.

9. What is Exhibit 10?

12:10:10

16           A.     It is my responses and objections to  
17     the defendant's first request for the production  
18     of documents.

19 Q. Okay. And we discussed earlier that  
20 you searched for documents related to your work  
21 for the campaign; right?

22 | A Yes

23 Q. You testified earlier that you posted  
24 on social media to try to attract volunteers; is  
25 that right?

12:10:36

1 Robinson

3 Q. Did you produce documents from your  
4 social media accounts regarding volunteers?

5 A. There weren't any documents to produce. 12:10:44

6 Q. You did not produce any of your social  
7 media posts from your time at the campaign, did  
8 you?

9 MS. COLE-CHU: Objection to form.

10 A. There were not any for me to produce 12:11:08  
11 because on my Facebook shortly after I posted a  
12 picture of Bloomberg I deleted it. It got a  
13 negative -- it got a super negative response. I  
14 was meme'd.

15 Q. Did you post on Instagram? 12:11:30

16           A.     No.   The campaign did.   The campaign  
17        took my image and posted to their Instagram  
18        account, so why don't you produce those  
19        documents -- or did I post on -- I don't know, i  
20        Michael Douglas on my Instagram?   God, I think -  
21        I think Michael Douglas's son is on my Instagram  
22        and I don't believe that that picture was taken  
23        like with any campaign material.

24 Q. But you posted about the campaign and a  
25 picture of Michael Douglas's son on your -- 12:12:11

Page 116

1 Robinson

2 MS. COLE-CHU: Objection.

3 A. Yeah, yeah, on my Instagram, I think.

4 Q. And you didn't produce it? You didn't  
5 produce that post in this lawsuit?

12:12:23

6 A. No, I did not.

7 Q. Why not?

8 A. Didn't know I had to.

9 Q. Okay.

10 A. I know the campaign has that post. Why 12:12:32  
11 would I give the campaign something they had?

12 Q. You have independent obligations to  
13 search for and produce documents, including social  
14 media posts, in your possession. And if you  
15 posted -- so did you -- what Instagram handles did 12:12:45  
16 you use at the time you worked for the campaign?

17 A. I don't recall. I have actually  
18 changed my Instagram handle several times since  
19 then, so I don't recall.

20 Q. And is your testimony that you did not 12:13:04  
21 post on your personal Instagram about the  
22 campaign?

23 A. No, that is not my testimony.

24 Q. Okay. So you did post on your personal  
25 Instagram about the campaign?

12:13:18

1 Robinson

2           A.       My testimony is that I posted a picture  
3       of Michael Douglas's son on my Instagram. That's  
4       my testimony.

5 Q. And you didn't produce that picture or 12:13:41  
6 that post; right?

A. That is also correct.

8 Q. Okay. We're going to be calling for  
9 the production of all Instagram, Twitter, and  
10 Facebook posts regarding the campaign. Those were 12:13:55  
11 already included in request, and they should have  
12 been produced in advance of this deposition.

13 A. It likely --

Q. Please let me finish the question.

15 A. -- wasn't produced because there is no 12:14:04  
16 campaign material in it. Now, what do you want?  
17 Everything that I've ever done in regards to  
18 anybody political and/or famous? Because there's  
19 a whole lot of that shit, and it doesn't have  
20 anything to do with Michael Bloomberg. 12:14:19

Also, what are you, what are you, what  
is Michael Bloomberg these days?

23 Listen, Hannah, can we take a break,  
24 because this lady is about to piss me off.

25 MS. COLE-CHU: Can we take a short 12:14:32

Page 118

1 Robinson

2 break?

3 MS. BADDISH: Sure. Five minutes,  
4 please.

5 THE VIDEOGRAPHER: The time is 12:15. 12:14:36  
6 We are off the record.

7 (Recess taken from 12:15 to 12:23.)

8 THE VIDEOGRAPHER: The time is 12:23.  
9 We are on the record.

10 Q. Mr. Robinson, have you ever complained 12:23:21  
11 about discrimination about any entity to which  
12 you've provided services?

13 MS. COLE-CHU: Objection to form.

14 Q. Let me -- strike that. Let me reask  
15 that question. 12:23:39

16 Have you lodged any previous complaints  
17 against former employers or entities for which you  
18 performed services?

19 A. Yes.

20 Q. What were those complaints? 12:23:48

21 A. I sued West for discrimination.

22 Q. I'm having trouble hearing you.

23 A. Well, can you hear me now?

24 Q. That's much better. Thank you.

25 You complained to West about 12:24:11

Page 120

1 Robinson

A. No, no, I don't think so.

3 Q. Have you ever filed any litigation or  
4 administrative charge against any entity for which  
5 you performed services?

12:25:48

6 A. That is an unusually broad question.

7 Q. Have you ever filed a lawsuit before?

8 A. Have I ever sued anybody? Yeah.

## 9 Q. Who?

10 A. I sued a landlord once and won.

12:26:06

11 Q. Anyone else?

12 A. No, not that -- not to my knowledge,  
13 not that I recall, not right now.

14 Q. Has anyone lodged any complaints about  
15 you?

12:26:23

**A. Have I ever been sued?**

17 Q. That was not my question, but you can  
18 answer that question as well. Have you ever  
19 been -- has anyone ever lodged any complaints  
20 about you where you worked?

12:26:36

21 A. Yes.

Q. What kind of complaints?

23 MS. COLE-CHU: Objection. Noa, I'd  
24 like to take a break and give you a call, if  
25 that's all right.

12:26:55

Page 121

1 Robinson

2 MS. BADDISH: No. We're going to  
3 continue. We have taken a lot of breaks  
4 today, Hannah.

5 MS. COLE-CHU: I think you are 12:27:01  
6 approaching an issue going down a road that I  
7 would like to discuss with you before you do  
8 that.

9 MS. BADDISH: Can I assume the answer  
10 to the question is yes? 12:27:08

11 MS. COLE-CHU: No.

12 THE WITNESS: I didn't answer anything,  
13 so you can make no assumptions.

14 Q. I'd like you to answer the question yes  
15 or no. 12:27:22

16 MS. COLE-CHU: Can you please repeat  
17 the question?

18 MS. BADDISH: Laurie, can you please  
19 read the question back.

20 (Record read.) 12:27:47

21 MS. COLE-CHU: I'm going to object.

22 A. The answer is various.

23 Q. What kinds of complaints?

24 A. Various.

25 Q. What do you mean by "various"? 12:28:06

Page 122

1 Robinson

2 MS. COLE-CHU: I'm going to object  
3 again and, Noa, ask again that we take a break  
4 so we can discuss this line of questioning.

5 MS. BADDISH: I don't understand what 12:28:19  
6 the concern is. If there is a potential  
7 criminal issue, you know, you can respond  
8 accordingly, but I don't see why we cannot  
9 pursue this line of questioning. He is a  
10 class representative in this lawsuit, and I 12:28:33  
11 don't see the basis for your objection.

12 MS. COLE-CHU: Yes, and I'm happy to  
13 explain. I would like to discuss it with you  
14 off-line to see if we can reach an agreement.

15 MS. BADDISH: We are on the record, 12:28:48  
16 Hannah. And we've taken a number of breaks.  
17 You could have discussed this with me before  
18 during one of those breaks or during the  
19 deposition. But right now I'm going to ask  
20 that we stay on the record and ask  
21 Mr. Robinson to answer the question.

22 THE WITNESS: I'm not answering.

23 MS. COLE-CHU: I did not know what -- I  
24 did not know that you would be asking these  
25 questions until you began asking them. There 12:29:05

Page 123

1 Robinson

2 are certain matters that I will instruct my  
3 client not to answer and testify about.

4 I am not saying that he won't give any  
5 testimony with respect to anything that you're 12:29:17  
6 asking about. In order to get on the same  
7 page, because I believe he can give testimony  
8 in response to some of these questions, I want  
9 to make sure that you are not venturing into a  
10 realm that he cannot give testimony about or 12:29:35  
11 that I would instruct him not to answer, and  
12 that's why I want to give --

13 MS. BADDISH: We're on the record. I  
14 would rather have this conversation on the  
15 record. 12:29:44

16 What is the basis for which he would  
17 not have to answer my questions?

18 MS. COLE-CHU: Again, I don't know  
19 until you ask them and --

20 MS. BADDISH: I just asked the 12:29:55  
21 question, and you're not -- I'm asking him  
22 what the nature of the complaints that have  
23 been lodged against him are. And you're  
24 objecting, and you're not telling me what the  
25 basis of your objection is. 12:30:05

Page 124

1 Robinson

2 So I'm just going to continue to ask  
3 the questions. You haven't given me any  
4 information as to why this question should be  
5 treated differently than any other questions 12:30:13  
6 that I've asked earlier. So --

7 MS. COLE-CHU: The basis of my  
8 objection is proportionality, relevance,  
9 privacy, harassment, and all constitutional  
10 protections. 12:30:25

11 MS. BADDISH: Okay. Well -- all what?

12 MS. COLE-CHU: Constitutional  
13 protections.

14 MS. BADDISH: Are you saying -- can you  
15 specify what protections those are? I mean, 12:30:34  
16 the relevance proportionality, that's not  
17 going to fly. He's a class representative.  
18 We are entitled to know whether he's been  
19 complained about and the nature of those  
20 complaints, especially in the workplace. 12:30:49

21 MS. COLE-CHU: Can you explain what --  
22 how that's proportional to -- how that's  
23 proportional?

24 MS. BADDISH: I think it's abundantly  
25 clear. I shouldn't have to explain that. So 12:31:01

Page 131

1 Robinson

him or are you instructing him not to do that  
as well?

4 MS. COLE-CHU: I will allow

5 Mr. Robinson to acknowledge whether that is a 12:48:35  
6 public posting.

7 MS. BADDISH: Okay.

8 Q. Mr. Robinson, if you could refer back  
9 to what's been marked as Robinson Exhibit 11.

10 A. Yes.

12:48:52

11 Q. Can you confirm that this is a public  
12 posting on a blog that you created?

13 A. I can --

14 MS. COLE-CHU: Objection to form, and  
15 I'm going to instruct the witness not to  
16 answer.

17 MS. BADDISH: I'm just asking him is  
18 this a public posting by you.

19 THE WITNESS: Hannah, are you  
20 instructing me not to answer?

MS. COLE-CHU: You can answer

THE WITNESS: This is a public posting.

23 Q. By you?

THE WITNESS: Hannah, are you --

25 MS. COLE-CHU: Objection.

12:49:25

Page 132

1 Robinson

2 You can answer.

3 THE WITNESS: By me? Yes.

4 Q. Okay.

5 A. You like it, don't you, lady? Attorney 12:49:43  
6 Baddish, I'm talking to you, baby. You like it,  
7 don't you, lady?

8 Q. Excuse me? What --

9 A. You like it. You heard me. You like  
10 it, don't you -- 12:49:57

11 MS. COLE-CHU: Mr. Robinson --

12 A. -- using these classic racist tropes.  
13 You like it, debasing a Black man.

14 Q. Mr. Robinson --

15 A. You like it, don't you, Attorney 12:50:04  
16 Baddish?

17 Q. I'm going to ask you to stop now  
18 because you've been --

19 A. Attorney Baddish.

20 Q. No, no. 12:50:08

21 A. You like it, don't you?

22 Q. You have been disrespectful all day.

23 No.

24 A. Are you enjoying yourself, Attorney

25 Baddish? 12:50:14

Page 133

1 Robinson

2 MS. COLE-CHU: Mr. Robinson --

3 Q. Mr. Robinson, you are acting completely  
4 inappropriately, and I'm going to ask that you  
5 stop. We're almost done with the deposition.

6           A.     Wrap it up, ma'am, because while you're  
7       sitting here engaging in conjecture, harassment,  
8       and the willful debasement of a community pillar  
9       and enjoying yourself --

Q. I'm just doing my job.

12:50:42

11           A. -- I have actual things that I could be  
12 doing with my day.

13 Q. You chose to sue --

14 A. You are having a good time, aren't you?

15 Q. You chose to bring a lawsuit against  
16 the campaign.

17 MS. COLE-CHU: Mr. Robinson --

18 A. But are you having a good time --

19 MS. BADDISH: Hannah --

A. -- pursuing this line of questioning?

21 MS. COLE-CHU: Mr. Robinson,

22 Mr. Robinson, we're almost done. We're almost  
23 done.

A. Attorney Baddish, wrap it up. You're

25 almost there, aren't you? Or did you want -- or 12:51:03

Page 134

1 Robinson

2 did you want --

3 MS. COLE-CHU: Mr. Robinson --

4 A. -- to harass me a little bit more, huh?

5 MS. COLE-CHU: Mr. Robinson -- 12:51:12

6 Can we just go off the record for a  
7 second.

8 MS. BADDISH: No.

9 A. Is that what you're excited about,  
10 ma'am? 12:51:19

11 THE VIDEOGRAPHER: Counsel, the time --

12 MS. BADDISH: We're not going off the  
13 record.

14 MS. COLE-CHU: Mr. Robinson --

15 MS. BADDISH: We're not going off the 12:51:22  
16 record.

17 MS. COLE-CHU: -- we're almost done.

18 MS. BADDISH: We can't go off the  
19 record unless I agree. We're not going off  
20 the record. This should all be on the record. 12:51:25

21 THE WITNESS: You know what off the  
22 record is?

23 Q. Excuse me? Oh, did you just give me  
24 the finger?

25 A. No, ma'am. 12:51:38

Page 135

1 Robinson

2 MS. COLE-CHU: Mr. Robinson --

3 A. I pointed.

4 Q. Well, don't worry. This is all on  
5 video, so we'll be able to watch this again. 12:51:44

6 A. That will be outstanding.

7 Q. Great. Okay.

8 A. I'm certain that you -- I'm certain --  
9 I'm certain -- I'm certain that you certainly --  
10 you would want, you know, a whole lot of people 12:51:56  
11 seeing exactly how you've debased yourself --

12 Q. The record will speak for itself.

13 A. -- with your behavior.

14 MS. COLE-CHU: Mr. Robinson, we're  
15 almost done. If you could just answer the 12:52:09  
16 final questions, and then we'll be done.

17 THE WITNESS: Absolutely, ma'am.

18 MS. BADDISH: Duane, would you please  
19 mark Tab 26 as Robinson Exhibit 12.

20 (Pause.) 12:52:23

21 THE CONCIERGE TECHNICIAN: Robinson 12  
22 has been marked. Just a moment. A little bit  
23 larger file.

24 (Robinson Exhibit 12, employee  
25 handbook, marked for identification.) 12:53:03

Page 139

1 Robinson

2 overtime that I worked for Michael Bloomberg.

3 Q. Okay. But it accurately represents how  
4 much you were paid; right?

5 A. To my knowledge.

12:58:55

6 MS. BADDISH: Okay. If we can just  
7 take a five-minute break, I think I'm done.

8 THE WITNESS: Do you think you're done?  
9 Are you done?

10 THE VIDEOGRAPHER: The time is 12:59.

12:59:04

11 MS. BADDISH: (Inaudible.)

12 THE VIDEOGRAPHER: We're going off the  
13 record.

14 THE WITNESS: Fuck not. Are we on a  
15 break? Are you done? Is she done?

12:59:08

16 MS. COLE-CHU: Mr. Robinson, can you  
17 just mute?

18 THE WITNESS: Is she done? Because if  
19 she's done, I'm done.

20 MS. COLE-CHU: I think she's reviewing  
21 her notes to make sure that she's done. So  
22 we're going to take a five-minute break. So  
23 let's meet.

24 THE WITNESS: Attorney Baddish is a --

25 MS. COLE-CHU: Mr. Robinson, can you

12:59:25

Page 140

1 Robinson

2 just mute for me?

3 THE WITNESS: She's a lovely lady.

4 Great attorney. I appreciate her.

5 MS. COLE-CHU: Can you mute for me? 12:59:34

6 (Recess taken from 12:59 to 1:06.)

7 THE VIDEOGRAPHER: The time is 1:06.

8 We are on the record.

9 Q. Mr. Robinson, when was the last time  
10 that you consumed alcohol? I can't hear you. 01:06:12

11 A. Yesterday.

12 Q. When was the last time you consumed  
13 marijuana?

14 MS. COLE-CHU: Objection.

15 A. Yesterday. 01:06:32

16 Q. When?

17 A. Yesterday -- yesterday.

18 Q. Yesterday evening?

19 A. Yester-day.

20 Q. Okay. 01:06:55

21 A. Ma'am, ma'am, that certainly isn't a  
22 line of questioning that you want to pursue with  
23 an expert on cannabis.

24 Q. Okay. It certainly is --

25 A. Yesterday. 01:07:12

Page 141

1 Robinson

2 Q. Okay. You've answered the question.

3 A. Move on.

4 Q. Mr. Robinson, did you communicate with  
5 your lawyer about your testimony today? 01:07:24

6 MS. COLE-CHU: Objection. I'd just  
7 like to caution Mr. Robinson not to reveal any  
8 communications that took place between him and  
9 his counsel.

10 Q. I'm not asking you to disclose the 01:07:39  
11 substance of those communications; I'm just asking  
12 whether or not those conversations occurred.

13 A. I have communicated with my attorney.

14 Q. About your testimony today?

15 A. Yes. 01:07:52

16 Q. During today's deposition?

17 A. No, not during.

18 Q. When we have taken breaks during  
19 today's deposition, you have communicated with  
20 your counsel about your testimony? 01:08:05

21 A. I have certainly consulted with my  
22 attorneys. There's absolutely no crime in that,  
23 and there's nothing wrong with that.

24 MS. BADDISH: Okay. I have no further  
25 questions, but we're going to reserve our 01:08:18

Page 142

1 Robinson

2 rights and keeping the deposition open, given  
3 the numerous issues that arose during the  
4 deposition.

5 MS. COLE-CHU: I don't have any further 01:08:27  
6 questions. We can go off the record.

7 THE VIDEOGRAPHER: Thank you, counsel.

8 Here ends media unit number 3. This concludes  
9 the video recorded virtual remote deposition  
10 of Alan Robinson taken by the defendants on 01:08:40  
11 Tuesday, November 1st, 2022. The time is 1:08  
12 p.m. central daylight time, and we are going  
13 off the record.

14 (Time noted: 1:08 p.m.)

15 \_\_\_\_\_  
16 ALAN C. ROBINSON

17  
18 Subscribed and sworn to before me  
19 this \_\_\_\_ day of \_\_\_\_\_ 2022.  
20  
21 \_\_\_\_\_  
22  
23  
24  
25

